

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
and JANE DOES 1 through 5,
Defendants.

Civil Action No. 04-10535 PBS

**PLAINTIFF SHAREHOLDER.COM'S INITIAL DISCLOSURE STATEMENT
PURSUANT TO FED. R. CIV. P. 26(a)(1)**

Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A), plaintiff Direct Report Corporation d/b/a Shareholder.com ("Shareholder.com") provides the following initial disclosures.

A. Individuals With Discoverable Information.

As currently advised, the following individuals are likely to have discoverable information that Shareholder.com may use to support its claims:

Name	Subjects About Which the Witness Has Information
Ronald H. Gruner President Shareholder.com 12 Clock Tower Place Maynard, MA 01754	The discovery of CCBN's intrusions into Shareholder.com's internal computer and communication systems.
Keith Barrett Vice President, Operations Shareholder.com 12 Clock Tower Place Maynard, MA 01754	The nature of CCBN's intrusions into Shareholder.com's internal computer and communication systems.

Edson DeCastro 21 Gulf Street Boylston, MA 01505	Communications with CCBN regarding the intrusions into Shareholder.com's computer systems.
Jeffrey Parker 253 Meadowbrook Rd Weston, MA 02493	Communications with Shareholder.com regarding the intrusions into Shareholder.com's computer systems and any CCBN investigation of same.
Jason Buckley CCBN.com, Inc. 343 Congress Street 5th Floor Boston, MA 02210	The use of CCBN computers to infiltrate Shareholder.com's computer systems.
Michael Gendreau CCBN.com, Inc. 343 Congress Street 5th Floor Boston, MA 02210	The use of CCBN computers to infiltrate Shareholder.com's computer systems.
Joshua Halpern ICG, Inc. P.O. Box 3599 Princeton, NJ 08543	The nature of CCBN's intrusions into Shareholder.com's internal computer and communication systems.
Sharon Rowlands Thomson Financial 195 Broadway New York, NY 10007	The integration and absorption of CCBN's operations into Thomson.
Commonwealth of Massachusetts, Office of the Attorney General One Ashburton Place Boston, MA 02108-1698	The Attorney General's investigation into CCBN's infiltration of Shareholder.com's internal computer and communication systems.

B. Categories of Documents in Shareholder.com's Possession that it May Use to Support its Claims.

As currently advised, Shareholder.com may use the following categories of documents to support its claims:

1. Computer logs and other documents evidencing defendants' infiltration into Shareholder.com's internal computer and communication systems.
2. Information on revenues derived from customers pilfered by CCBN.

3. Information from the Massachusetts Office of the Attorney General concerning its investigation of CCBN.

All of the above-listed categories of documents are in the custody and control of either Shareholder.com, 12 Clock Tower Place, Maynard, MA 01754 or Palmer & Dodge, 111 Huntington Avenue, Boston MA 02199.

C. Computation of Damages

Shareholder.com is currently unable to provide a computation of its actual damages. Information permitting such a computation remains within the exclusive control of defendants. Once information sufficient to permit a computation becomes available through discovery, Shareholder.com will supplement its disclosure.

In addition to actual damages, Shareholder.com will seek statutory damages, punitive and multiple damages as appropriate, attorneys' fees, costs, and interest.

D. Insurance Agreements

Shareholder.com is not aware of any applicable insurance agreements.

SHAREHOLDER.COM, INC.,

By its attorneys,

/s/ John T. Bennett

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